

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

SUPPLEMENTAL DECLARATION OF ERIC R. NITZ

Eric R. Nitz declares, pursuant to 28 U.S.C. § 1746:

1. I am an associate at MoloLamken LLP.
2. Attached as Exhibit 1 is a demonstrative slide from Objectors' argument at the November 19, 2014 fairness hearing.
3. Attached as Exhibit 2 is a true and correct copy of Leavy, *The Woman Who Would Save Football*, Grantland (Aug. 17, 2012), <http://grantland.com/features/neuropathologist-dr-ann-mckee-accused-killing-football-be-sport-only-hope/>, accessed on December 1, 2014.
4. Attached as Exhibit 3 is a true and correct copy of Sun, *NY Giants' Steve Tisch Reveals His \$10M Plan to Further Concussion Research*, Hollywood Reporter (Sept. 11, 2014),

<http://www.hollywoodreporter.com/news/ny-giants-steve-tisch-reveals-731376>, accessed on December 1, 2014.

5. Attached as Exhibit 4 is a true and correct copy of ImPACT, <https://www.impacttest.com/about/?ImPACT-Founders-6>, accessed on December 1, 2014.

6. Attached as Exhibit 5 is a true and correct copy of Keating, *NFL's Concussions Expert Also Sells Equipment to League*, ESPN The Magazine (Aug. 10, 2007), <http://sports.espn.go.com/nfl/news/story?id=2967678>, accessed on December 1, 2014.

7. Attached as Exhibit 6 is a true and correct copy of Iverson, *Advances and Controversies in Neuropsychological Assessment: 7-Year Funding Disclosure*, http://www.sgtv.org/download/271113_iverson_advances_controversies_in_np_assessment.pdf, accessed on December 1, 2014.

8. Attached as Exhibit 7 is a true and correct copy of Chronic Traumatic Encephalopathy, *NFL Concussion Lawsuits: An Anapol Schwartz Information Website*, <http://nfl-concussions-lawsuit.com/nfl-concussion-lawsuit-news/chronic-traumatic-encephalopathy/>, accessed on December 1, 2014.

9. Attached as Exhibit 8 is a true and correct copy of The Locks Law Firm, *NFL Head Trauma Litigation*, <http://www.lockslaw.com/html/nfl.html>, accessed on December 1, 2014.

10. Attached as Exhibit 9 is a true and correct copy of Delsohn, *OTL: Belcher's Brain Had CTE Signs*, ESPN (Sept. 30, 2014), http://espn.go.com/espn/otl/story/_/id/11612386/jovan-belcher-brain-showed-signs-cte-doctor-says-report, accessed on December 1, 2014.

11. Attached as Exhibit 10 is a true and correct copy of Smith, *Ex-Falcons Lineman Had Brain Disease Linked to Concussions*, CNN Health (Apr. 1, 2011), <http://>

www.cnn.com/2011/HEALTH/04/01/brain.concussion.dronett/index.html?hpt=Sbin, accessed on December 1, 2014.

12. Attached as Exhibit 11 is a true and correct copy of McDonald, *Study Finds a Strong Correlation Between Repeated Head Trauma and Domestic Abuse*, The Washington Post (Oct. 22, 2014), <http://www.washingtonpost.com/news/morning-mix/wp/2014/10/22/study-finds-a-strong-correlation-between-repeated-head-trauma-and-domestic-abuse/>, accessed on December 1, 2014.

13. Attached as Exhibit 12 is a true and correct copy of Smith, *Lives after Junior*, ESPN (May 2, 2013) http://espn.go.com/nfl/story/_/id/9410051/a-year-later-one-junior-seau-close-friends-comes-forward-recount-version-descent, accessed on December 1, 2014.

14. Attached as Exhibit 13 is a true and correct copy of Associated Press, *Ex-Steeler Long Drank Antifreeze To Commit Suicide*, ESPN (Jan. 26, 2006), <http://sports.espn.go.com/nfl/news/story?id=2307003>, accessed on December 1, 2014.

15. Attached as Exhibit 14 is a true and correct copy of Weiner, *et al.*, *Military Risk Factors for Alzheimer's Disease*, 9 *Alzheimer's & Dementia* 445 (2013).

16. Attached as Exhibit 15 is a true and correct copy of Dao, *Brain Ailments in Veterans Likened to Those in Athletes*, N.Y. Times (May 16, 2012), http://www.nytimes.com/2012/05/17/us/brain-disease-is-found-in-veterans-exposed-to-bombs.html?pagewanted=all&_r=0, accessed on December 1, 2014.

17. Attached as Exhibit 16 is a true and correct copy of Carroll, *Could Brain Injuries Be Behind the NFL Rap Sheet?*, NBC News (Sept. 17, 2014), <http://www.nbcnews.com/storyline/nfl-controversy/could-brain-injuries-be-behind-nfl-rap-sheet-n205666>, accessed on December 1, 2014.

18. Attached as Exhibit 17 is a true and correct copy of Dall *et al.*, *Supply and Demand Analysis of the Current and Future US Neurology Workforce*, 81 *Neurology* 470, 470-71 (2013).

19. Attached as Exhibit 18 is a true and correct copy of Frontline, *League of Denial: The NFL's Concussion Crisis*, <http://www.pbs.org/wgbh/pages/frontline/sports/leagueofdenial/transcript50/>, accessed on December 1, 2014.

20. Attached as Exhibit 19 is a true and correct copy of Mark Fainaru-Wada & Steve Fainaru, *League of Denial* (2013).

21. Attached as Exhibit 20 is a true and correct copy of Sandomir, *Partly by Shunning Documentary, ESPN Lifts It*, N.Y. Times (Oct. 9, 2013), <http://www.nytimes.com/2013/10/10/sports/football/by-shunning-concussion-documentary-espn-gives-it-a-lift.html>, accessed on December 1, 2014.

22. Attached as Exhibit 21 is a true and correct copy of Erichson, *The NFL Concussion Settlement: Class Action Exploitation*, Mass Tort Litigation Blog (Nov. 18, 2014), http://lawprofessors.typepad.com/mass_tort_litigation/2014/11/the-nfl-concussion-settlement-and-class-action-exploitation.html, accessed on December 2, 2014.

23. Attached as Exhibit 22 is a true and correct copy of Kaplen & De Caro, *Op-Ed: Concussion Settlement Is Deeply Flawed*, National Law Journal (July 21, 2014), <http://www.nationallawjournal.com/id=1202663714809/OpEd-Concussion-Settlement-Is-Deeply-Flawed>, accessed on December 2, 2014.

24. Attached as Exhibit 23 is a true and correct copy of Daugherty, *Settlement II: Concussion Cases Become a Headache for NFL*, San Diego Reader (July 9, 2014),

<http://www.sandiegoreader.com/news/2014/jul/09/sporting-settlement-II>, accessed on December 2, 2014.

25. Attached as Exhibit 24 is a true and correct copy of Pearson & Feeley, *NFL Critics Say Concussion Accord Ignores Broken Lives*, Bloomberg (Nov. 19, 2014), <http://www.bloomberg.com/news/2014-11-19/nfl-settlement-objectors-seek-to-sway-judge-from-approval.html>, accessed on December 2, 2014.

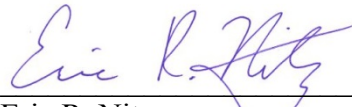
26. Attached as Exhibit 25 is a true and correct copy of Hrubby, *The NFL Concussion Settlement Is Pure Evil*, Vice Sports (Oct. 28, 2014), <https://sports.vice.com/article/the-nfl-concussion-settlement-is-pure-evil>, accessed on December 2, 2014.

27. Attached as Exhibit 26 is a true and correct copy of Hrubby, *The NFL Dodges on Brain Injuries*, The Atlantic (Sept. 4, 2014), <http://www.theatlantic.com/entertainment/archive/2014/09/the-nfls-concussion-settlement-not-acceptable/379557>, accessed on December 2, 2014.

28. Attached as Exhibit 27 is a true and correct copy of Reed, *Time's Running Out To Stop Bad NFL Concussion Settlement*, League of Fans (Nov. 14, 2014), <http://leagueoffans.org/2014/11/14/times-running-out-to-stop-bad-nfl-concussion-settlement>, accessed on December 2, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 2, 2014


Eric R. Nitz